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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

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Anonymous public comment

Submitter Information

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General Comment

- While most farms are exempt from having to comply with Clean Water Act rules that apply to the other pollution sources, many have voluntarily installed conservation practices with the help of hundreds of millions of state and federal cost-share dollars over the years.
- Unfortunately, farmers that refuse to install adequate conservation practices endanger their downstream neighbors' health, livelihood, and quality of life.
- The conservation community recognizes the value of family farms and does not want to unfairly burden the farmers who grow our food and enrich our communities. Such an approach would be short-sighted because well-operated farms are far preferable to sprawling urban development.
- Conservation groups have worked hand-in-hand with farmers' representatives in Richmond and Washington to seek increased and sustainable funding for conservation practices.

- Virginia's draft watershed implementation plan (WIP) does not provide "reasonable assurance," in other words, the details and a commitment, that a reliable source of funding for farmers is forthcoming. If the state does not provide such assurance that all pollution sources--including agriculture—have the tools to do their part, then EPA has no choice under the law but to tighten requirements on sources it has direct authority to regulate, specifically, wastewater treatment plants, cities, and large animal operations.
- Virginia's citizens should ask that Virginia prepare a final WIP that provides a real commitment to fund conservation practices on farms over the next 15 years, specifically programs that are highly incented in the early years and provide flexible ways to deliver funds to all types of farmers, including those that do not accept government funding.
- A final WIP from Virginia that includes fair and equitable mandates and adequate funding will make EPA action unnecessary.
- It is important to remember that installation of conservation practices to address Bay clean up go